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July 29, 2005

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JUL 29 2005
PSC SC
DOCKETING DEPT.

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tod

Mr. Charles L. A. Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Generic Proceeding to Investigate Emergency Services Continuity Plans
Docket No. 2005-100-C

Dear Mr. Terreni:

Enclosed for filing are an original and twenty-five copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Steven L. Inman in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of the testimony as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
DM5 # 595429

RETURN DATE: OK tod
SERVICE: OK tod

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF STEVEN L. INMAN
3 BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
4 DOCKET NO. 2005-100-C
5 JULY 29, 2005

6
7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS
9 ADDRESS.

10 A. My name is Steven L. Inman. I am employed by BellSouth as Director –
11 Regulatory for the nine-state BellSouth region. My business address is 675 West
12 Peachtree Street, Atlanta, Georgia 30375.

13
14 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND
15 AND EXPERIENCE.

16
17 A. I have 30 years experience in the telecommunications industry with BellSouth,
18 Bellcore and South Central Bell. I began my career with South Central Bell
19 shortly after I graduated from the University of Tennessee in 1975 with a
20 Bachelor of Science degree in Electrical Engineering. I have been a director in
21 BellSouth's regulatory department for 10 years. I have experience in retail and
22 wholesale regulatory, pricing, jurisdictional separations, cost studies and
23 engineering.

24

1 Q. WHAT EVENTS LED TO THE ESTABLISHMENT OF THIS GENERIC
2 DOCKET?

3

4 A. On January 9, 2003, BellSouth filed Tariff No. 2003-6, which generally is
5 referred to as the Emergency Service Continuity Plan ("ESCP"). After the ESCP
6 tariff became effective, AT&T filed a Petition for Suspension and Investigation of
7 the tariff. In Order No. 2003-218 that the Public Service Commission of South
8 Carolina ("Commission") entered in Docket No. 2003-89-C on April 3, 2003, the
9 Commission denied AT&T's Petition and established a generic docket to
10 investigate emergency service continuity plans in general.

11

12 Q. WHAT IS THE CURRENT STATUS OF BELL SOUTH'S ESCP TARIFF?

13

14 A. BellSouth is withdrawing the ESCP tariff. Exhibit SI-1 to my testimony is a
15 copy of BellSouth's filing to withdraw this tariff.

16

17 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

18

19 A. My testimony presents BellSouth's positions on the following issues that are set
20 forth in the Supplemental Notice of Generic Proceeding the Commission issued in
21 this docket on July 18, 2005:

22 (1) What, if any, emergency service continuity plan should be adopted by
23 the Commission for customers who have lost service due to a service
24 provider's abandonment of service?

1 (2) What provisions should there be for maintenance of emergency service
2 access during periods of suspension of service?

3
4 (3) Should interim service providers be entitled to recover costs for
5 providing interim service? If so, how should such costs be recovered?

6
7 (4) What is the appropriate use of customer service record information for
8 provision of interim service?

9
10 *Issue (1): What, if any, emergency service continuity plan should be adopted by*
11 *the Commission for customers who have lost service due to a service provider's*
12 *abandonment of service?*

13
14 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

15
16 A. BellSouth believes the Commission should not adopt an emergency service
17 continuity plan. Instead, BellSouth suggests that the Commission address any
18 emergency service issues that may arise in the future on a case-by-case basis.

19
20 Q. WHY DOES BELL SOUTH SUGGEST THAT THE COMMISSION SHOULD
21 ADDRESS ANY EMERGENCY SERVICE ISSUES THAT ARISE IN THE
22 FUTURE ON A CASE-BY-CASE BASIS?

23
24 A. BellSouth's suggestion is based on its experience since filing its ESCP tariff in
25 South Carolina. When BellSouth filed this tariff some thirty months ago, many
26 (if not most) CLEC access lines in BellSouth's territory were resold lines or

1 UNE-P arrangements. By its own terms, therefore, the ESCP tariff applied only
2 when the end users at issue are served by a CLEC using these specific
3 arrangements. Moreover, prior to filing the tariff, BellSouth was working
4 diligently to address concerns related to a CLEC in Florida potentially
5 abandoning its customer base of more than two hundred thousand access lines in
6 BellSouth's territory. These two conditions led BellSouth to believe that it would
7 be prudent to file its ESCP tariff in South Carolina so that a mechanism would be
8 in place to address such emergency situations if they were to arise in this State.

9
10 The environment, however, has changed since BellSouth filed its ESCP tariff.
11 BellSouth has continued to refine and adapt its processes that apply when a CLEC
12 ceases to do business in South Carolina. Accordingly, since the tariff was filed,
13 no emergency situation has arisen in South Carolina as a result of a CLEC's
14 ceasing to do business in the State, and there has been no need for BellSouth to
15 ask the Commission to invoke the ESCP tariff.

16
17 Additionally, as a result of the ever-changing technology in this industry and
18 associated changes of law, the number of CLEC access lines in BellSouth's
19 territory that are provided in whole or in part over CLEC-provided facilities or by
20 way of commercial arrangements between CLECs and BellSouth continues to
21 grow. The ESCP tariff, however, does not apply to customers served by CLECs
22 using these arrangements. Moreover, as I explain below with regard to Issue No.
23 2, the most fair, effective, and efficient way of maintaining emergency service

1 access likely will vary widely from one situation to another, depending on a
2 number of factors.

3
4 In light of the pace at which technology and the law are changing in this industry,
5 it is clear that no single formula can address all possible conditions that may exist
6 if a CLEC ceases to do business in South Carolina. This, combined with the
7 history of smooth operations in this State, leads BellSouth to suggest that the
8 Commission should not attempt, in a generic proceeding, to address the various
9 permutations that may arise in the unlikely event of an emergency service
10 continuity situation. Instead, BellSouth suggests the Commission should address
11 any emergency service issues that may arise in the future on a case-by-case basis,
12 in light of the particular facts presented by a particular situation.

13
14 ***Issue (2): What provisions should there be for maintenance of emergency service***
15 ***access during periods of suspension of service?***

16
17 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

18
19 A. The most fair, effective, and efficient way of maintaining emergency service
20 access likely will vary widely depending on a number of factors including,
21 without limitation: the actions taken by the CLEC that is ceasing to do business in
22 the state; the manner in which the CLEC that is ceasing to do business in the state
23 serves its customers; the contractual and operational relationship between the
24 CLEC that is ceasing to do business in the state and other carriers; and the

1 contractual and operational relationship between the new service provider and
2 other carriers.

3
4 Rather than attempting to address the many permutations arising from these
5 factors in a generic proceeding, BellSouth suggests that it is preferable for the
6 Commission to address any emergency service issues that may arise in the future
7 on a case-by-case basis, in light of the particular facts presented by a particular
8 situation.

9
10 ***Issue (3): Should interim service providers be entitled to recover costs for***
11 ***providing interim service? If so, how should such costs be recovered?***

12
13 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

14
15 A. As stated above, BellSouth does not believe the Commission should adopt an
16 emergency service continuity plan in this proceeding.

17
18 If the Commission disagrees and established such a plan, however, BellSouth
19 believes that any entity that provides interim service pursuant to such a plan
20 should be compensated for doing so. The appropriate method of compensating
21 the interim service provider, however, likely will vary depending on the
22 circumstances. For example, if the interim provider has a direct billing
23 relationship with the end user following the interim period, it would be
24 appropriate to consider having the end user pay the interim service provider
25 directly. On the other hand, if the interim provider does not have a direct billing

1 relationship with the end user following the interim period, the Commission
2 should provide for other methods of compensating the interim service provider.

3
4 Rather than attempting to address the various permutations arising from these
5 factors in a generic proceeding, BellSouth suggests that it is preferable for the
6 Commission to address any emergency service issues that may arise in the future
7 on a case-by-case basis, in light of the particular facts presented by a particular
8 situation.

9
10 ***Issue (4): What is the appropriate use of customer service record information for***
11 ***provision of interim service?***

12
13 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

14
15 A. BellSouth's position is that any use of customer information for the provision of
16 interim service should comply with section 222 of the federal
17 Telecommunications Act of 1996 and the Federal Communications Commission's
18 rule and orders implementing that statute.

19
20 Q. DOES THAT CONCLUDE YOUR TESTIMONY?

21
22 A. Yes.

EXHIBIT SI-1

Cindy Cox
Vice President
Business Development and Governmental Relations

Suite 5470
1600 Williams Street
Post Office Box 752
Columbia, South Carolina 29201
803 401-2252
FAX 803 771-4680

July 29, 2005

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
Public Service Commission of South Carolina
Columbia, South Carolina 29211

Re: Generic Proceeding to Investigate Emergency Services Continuity Plans
Docket No. 2005-100-C

Dear Mr. Terreni:

Attached for filing with the Commission are the following pages:

General Subscriber Service Tariff

Subject Index - Seventeenth Revised Page 6
Section A5 - Contents, Forty-fourth Revised Page 1
- First Revised Page 31
- First Revised Page 32

The purpose of this filing is to remove BellSouth's Emergency Service Continuity Plan ("ESCP") from Section A5 of the General Subscriber Service Tariff.

When BellSouth filed this tariff some thirty months ago, many (if not most) CLEC access lines in BellSouth's territory were resold lines or UNE-P arrangements. By its own terms, therefore, the ESCP tariff applied only when the end users at issue are served by a CLEC using these specific arrangements. Moreover, prior to filing the tariff, BellSouth was working diligently to address concerns related to a CLEC in Florida potentially abandoning its customer base of more than two hundred thousand access lines in BellSouth's territory. These two conditions led BellSouth to believe that it would be prudent to file its ESCP tariff in South Carolina so that a mechanism would be in place to address such emergency situations if they were to arise in this State.

The environment, however, has changed since BellSouth filed its ESCP tariff. BellSouth has continued to refine and adapt its processes that apply when a CLEC ceases to do business in South Carolina. Accordingly, since the tariff was filed, no emergency

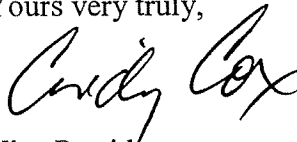
Mr. Charles L. A. Terreni
July 29, 2005
Page 2

situation has arisen in South Carolina as a result of a CLEC's ceasing to do business in the State, and there has been no need for BellSouth to ask the Commission to invoke the ESCP tariff.

Additionally, as a result of the ever-changing technology in this industry and associated changes of law, the number of CLEC access lines in BellSouth's territory that are provided in whole or in part over CLEC-provided facilities or by way of commercial arrangements between CLECs and BellSouth continues to grow. The ESCP tariff, however, does not apply to customers served by CLECs using these arrangements. Moreover, the most fair, effective, and efficient way of maintaining emergency service access will vary widely from one situation to another, depending on a number of factors.

In light of the pace at which technology and the law are changing in this industry, it is clear that no single formula can address all possible conditions that may exist if a CLEC ceases to do business in South Carolina. Additionally, as noted above, BellSouth has never invoked this tariff in South Carolina. Accordingly, BellSouth is withdrawing this tariff.

Yours very truly,

A handwritten signature in black ink, appearing to read "Cindy Cox". The signature is fluid and cursive, with the first name "Cindy" and last name "Cox" clearly distinguishable.

Vice President

Attachment
cc: ORS
DM5 # 595330

EXECUTIVE SUMMARY

Removal of Emergency Service Continuity Plan from Section A5

Introduction

The purpose of this filing is to remove BellSouth's Emergency Service Continuity Plan (ESCP) from Section A5 of the General Subscriber Service Tariff (GSST).

Description of Tariff Modifications

This filing removes A5.8 from the GSST.

Rationale for Changes

When BellSouth filed this tariff some thirty months ago, many (if not most) CLEC access lines in BellSouth's territory were resold lines or UNE-P arrangements. By its own terms, therefore, the ESCP tariff applied only when the end users at issue are served by a CLEC using these specific arrangements. Moreover, prior to filing the tariff, BellSouth was working diligently to address concerns related to a CLEC in Florida potentially abandoning its customer base of more than two hundred thousand access lines in BellSouth's territory. These two conditions led BellSouth to believe that it would be prudent to file its ESCP tariff in South Carolina so that a mechanism would be in place to address such emergency situations if they were to arise in this State.

The environment, however, has changed since BellSouth filed its ESCP tariff. BellSouth has continued to refine and adapt its processes that apply when a CLEC ceases to do business in South Carolina. Accordingly, since the tariff was filed, no emergency situation has arisen in South Carolina as a result of a CLEC's ceasing to do business in the State, and there has been no need for BellSouth to ask the Commission to invoke the ESCP tariff.

Additionally, as a result of the ever-changing technology in this industry and associated changes of law, the number of CLEC access lines in BellSouth's territory that are provided in whole or in part over CLEC-provided facilities or by way of commercial arrangements between CLECs and BellSouth continues to grow. The ESCP tariff, however, does not apply to customers served by CLECs using these arrangements. Moreover, the most fair, effective, and efficient way of maintaining emergency service access will vary widely from one situation to another, depending on a number of factors.

In light of the pace at which technology and the law are changing in this industry, it is clear that no single formula can address all possible conditions that may exist if a CLEC ceases to do business in South Carolina. Additionally, as noted

above, BellSouth has never invoked this tariff in South Carolina. Accordingly, BellSouth is withdrawing this tariff.

Effect on Existing Customers

There are no existing customers for this service.

Tariff Pages

Following are the Tariff pages being filed with the Commission.

General Subscriber Service Tariff

- Subject Index - Seventeenth Revised Page 6
- Section A5 - Contents, Forty-fourth Revised Page 1
 - First Revised Page 31
 - First Revised Page 32

EFFECTIVE: August 12, 2005

SUBJECT INDEX

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911 Service	A24.	
E911 Service	A24.	
(DELETED)		(D)
Enhanced Caller ID	A13.19.2	
Enhanced Extended Community Calling Service	A3.10.5	
Enterprise Service	A118.1	
Entrance Bridge	A14.1.2	
Equipment for Disabled Customers	A30.	
Equipment in Explosive Atmosphere	A2.5.6	
BellSouth Essentials Package	A13.78	(T)
Establishment and Furnishing of Service	A2.3	
Establishment of Identity	A2.2.2	
Exchange Access Premium Charge	A3.30	
Expanded Service Area	A3.4	
Experimental Message Rate Service	A103.4	
Extended Area Service (See Local Calling Areas)	A3.4	
Extended Community Calling	A3.10.3, A103.8.3	
Extended Network Interface	A107.2.6	
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A5.1.4 Construction on Private Property	2
A5.1.5 Minimum Revenue Guarantee and Extended Service Period	3
A5.1.6 Underground Service Entrances	3
A5.1.7 Special Types of Construction	3
A5.1.8 Rearrangement of Existing Plant	3
A5.1.9 Construction Required for Temporary Service	4
A5.1.10 Reserved for Future Use	4
A5.1.11 Special Construction Charges for Multiple Lines Terminated at Private Residence Locations	4
A5.2 Charges for Unusual Repair	4
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A5.6.1 General	15
A5.6.2 Rates and Charges	15
A5.7 Reserved for Future Use	30
A5.8 (DELETED)	31

(D)

BELLSOUTH
TELECOMMUNICATIONS, INC.
SOUTH CAROLINA
ISSUED: July 29, 2005
BY: President - South Carolina
Columbia, South Carolina

GENERAL SUBSCRIBER SERVICE TARIFF

First Revised Page 31
Cancels Original Page 31

EFFECTIVE: August 12, 2005

A5. CHARGES APPLICABLE UNDER SPECIAL CONDITIONS

A5.8 (DELETED)

(D)

BELLSOUTH
TELECOMMUNICATIONS, INC.
SOUTH CAROLINA
ISSUED: July 29, 2005
BY: President - South Carolina
Columbia, South Carolina

GENERAL SUBSCRIBER SERVICE TARIFF

First Revised Page 32
Cancels Original Page 32

EFFECTIVE: August 12, 2005

A5. CHARGES APPLICABLE UNDER SPECIAL CONDITIONS

A5.8 (DELETED) (Cont'd)

(D)

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

)
)
)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Direct Testimony of Steven L. Inman in Docket No. 2005-100-C to be served upon the following this July 29, 2005:

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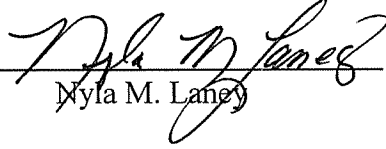
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Nyla M. Laney

PC Docs # 585223